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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

NOV 09 1994

Ms. Judi L. Durda  
Weinberg Consulting Group Inc.  
1220 Nineteenth St., N.W.  
Washington, D.C.

Dear Judi:

In cases where the risk assessment deviates from our guidelines, it is probably wise to be as clear as possible regarding our concerns. While we do not object to your approach, some points should be made to indicate our position. Please do not view these as an exhaustive representation, but rather as a general perspective.

- It should be made very clear that contamination levels at any point do not represent contamination either upgrade or downgrade. In addition, levels at a site boundary cannot be expected to characterize full temporal aspects of the site.
- Contamination at any one location cannot be assumed to represent either primary or secondary sources either upgrade or downgrade.
- It should be clear that any remedial plans resulting from the risk assessment may require additional sampling to fully characterize 'hot spots'.
- As you know, reviewers have questioned the adequacy and sufficiency of the data. While these questions may never be fully satisfied, basing removal action decisions on the data in hand should err on the conservative side.
- Extrapolating from the sampling points to the site as a whole is probably not going to be possible with your approach. That is why we prefer the 95% UCL and a 'go/no go' decision will likely be difficult. If possible, we would like to see a screening calculation using the 95% UCL as an appendix to the risk assessment portion of the document.

We have no quarrel with your intended use of the sample-specific-point approach, but merely want you to understand our position and views. As you may guess, we will review the results very conservatively.

Sincerely,

  
Robert S. Davis, Biologist

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